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Attorneys for Plaintiff  
UNITED STATES OF AMERICA

FILED IN THE  
UNITED STATES DISTRICT COURT  
DISTRICT OF HAWAII

DEC 17 2003

at 12 o'clock and 4 min. M  
WALTER A.Y.H. CHINN, CLERK

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,	)	CR. NO. <u>CR 03-00589</u>	HG
	)		
Plaintiff,	)		
	)	INDICTMENT	
vs.	)		
	)	[18 U.S.C. § 1001 - False	
PETER J. GADDY,	)	Statement in a Document	
	)	18 U.S.C. § 1035 - False	
Defendant.	)	Statement Relating to Health	
	)	Care]	
	)		

INDICTMENT

The Grand Jury charges that:

COUNT 1

[18 U.S.C. § 1001(a)(3) -  
False Statement in a Document]

On or about the October 23, 2000, in the District of  
Hawaii, in a matter within the jurisdiction of the General  
Services Administration, an agency within the Executive Branch of

the government of the United States, the defendant, PETER J. GADDY, did knowingly and willfully make and use a material false writing and document, knowing the same to contain a material false statement and entry; that is, the defendant submitted to the General Services Administration a "Health Benefits Election Form," adding "L.D.F." to the coverage under his federal health care benefits plan as his "spouse" when in truth and fact the defendant and "L.D.F." were not then married.

All in violation of Title 18, United States Code, Section 1001(a)(3).

COUNT 2

[18 U.S.C. § 1035(a)(2) -  
False Statement Relating to Health Care Matters]

On or about October 23, 2000, in the District of Hawaii, the defendant, PETER J. GADDY, in a matter involving a health care benefit program, did knowingly and willfully make and use a materially false writing and document, knowing the same to contain a material false statement and entry, in connection with the delivery of and payment for health care benefits and services; that is the defendant submitted a "Health Benefits Election Form" adding "L.D.F." to the coverage under his federal health care benefits plan as his "spouse" when in truth and fact the defendant and "L.D.F." were not then married.

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All in violation of Title 18, United States Code,  
Section 1035(a)(2).

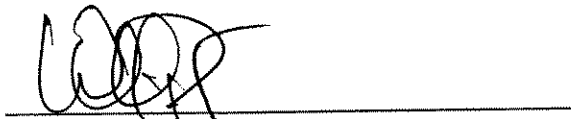
DATED: December 17, 2003 at Honolulu, Hawaii.

A TRUE BILL

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FOREPERSON, GRAND JURY

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United States v. Peter J. Gaddy  
Cr. No. \_\_\_\_\_  
"Indictment"